

[Stipulating parties listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

MASTER FILE NO. 07-cv-5944 SC
MDL NO. 1917

This Document Relates to: ALL INDIRECT
PURCHASER ACTIONS

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE DEADLINE
TO FILE A MOTION TO COMPEL
HITACHI DEFENDANTS TO
SUPPLEMENT RESPONSES TO
INDIRECT PURCHASER PLAINTIFFS'
FIRST SET OF INTERROGATORIES**

This Stipulation and Proposed Order between the Indirect-Purchaser Plaintiffs (“IPPs”) and Hitachi, Ltd. (“HTL”), Hitachi Displays, Ltd.(“HDP”), Hitachi Asia, Ltd. (“HAS”), Hitachi America, Ltd., and Hitachi Electronic Devices (USA), Inc. (collectively, “Hitachi Defendants”) (together, the “Parties”) is made with respect to the following facts and recitals:

WHEREAS, the IPPs and the Hitachi Defendants have met and conferred in order to resolve all outstanding discovery issues with regard to Hitachi’s responses to IPPs’ First Set of Interrogatories (“Interrogatories”);

WHEREAS, the Hitachi Defendants have agreed to supplement their responses to Interrogatory No. 6 to identify with greater specificity the publicly available information upon which the Hitachi Defendants intend to rely;

WHEREAS, the Hitachi Defendants have agreed to supplement their responses to

1 Interrogatory No., 7, as it related to their affirmative defenses Nos. 8, 13, 14, 19, 25, 27, 28, 32,
2 33, 34, 35 and 38 only;

3 WHEREAS, defendants HTL, HDP and HAS have agreed to supplement their responses to
4 Interrogatory No. 8;

5 WHEREAS, defendants HTL and HDP have agreed to supplement their responses to
6 Interrogatory No. 9;

7 WHEREAS, the Hitachi Defendants have agreed to supplement their responses to
8 Interrogatory Nos. 10, 11, 13, 15, 16, 18, 22, 23 and 24;

9 WHEREAS, the Parties are currently required to file any motion to compel by September
10 12, 2014;

11 WHEREAS, the Hitachi Defendants agree to supplement their responses to the above-
12 described Interrogatories by Friday, September 26, 2014;

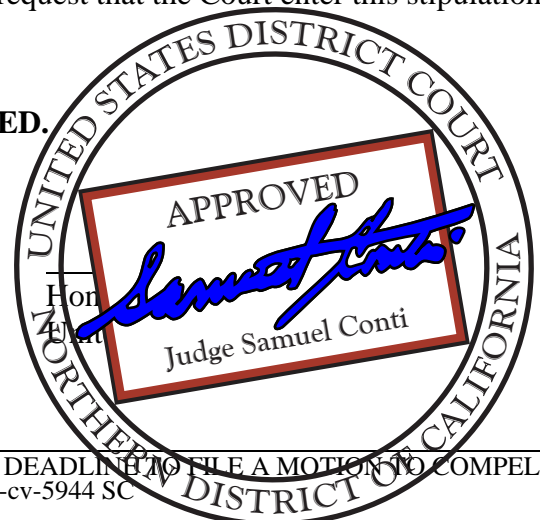
13 WHEREAS, the Hitachi Defendants agree to extend the deadline by which the IPPs may
14 file a motion to compel regarding the Hitachi Defendants' Responses to the above-described
15 Interrogatories to October 3, 2014.

16 **IT IS HEREBY STIPULATED AND AGREED** between the undersigned counsel that
17 the IPPs may file a motion to compel regarding the Hitachi Defendants' supplemental responses to
18 the IPPs' Interrogatory Nos. 6, 7 (as it related to affirmative defenses Nos. 8, 13, 14, 19, 25, 27,
19 28, 32, 33, 34, 35 and 38), 10, 11, 13, 15, 16, 18, 22, 23 and/or 24; defendants HTL's, HDP's and
20 HAS's supplement their responses to Interrogatory No. 8; and/or defendants HTL's and HDP's
21 supplemental responses to Interrogatory No. 9, no later than October 3, 2014.

22 The undersigned Parties jointly and respectfully request that the Court enter this stipulation
23 as an order.

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25
26 Dated: October 2, 2014
27
28



1 Dated: September 12, 2014

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Ltd., and Hitachi Electronic Devices (USA), Inc.

ECF CERTIFICATION

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: September 12, 2014

/s/ Jennie Lee Anderson

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